

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DECAPOLIS SYSTEMS, LLC,

Plaintiff,

v.

EPIC SYSTEMS CORPORATION,

Defendant.

Case No. 6:21-cv-00434-ADA

**Jury Trial Demanded**

---

**DECLARATION OF NICK SAROS IN SUPPORT OF DEFENDANT  
EPIC SYSTEMS CORPORATION'S MOTION TO DISMISS FOR  
IMPROPER VENUE OR TO TRANSFER VENUE TO THE  
WESTERN DISTRICT OF WISCONSIN**

I, Nick Saros, declare as follows:

1. I am a partner at Jenner & Block LLP, counsel for Defendant Epic Systems Corporation. I submit this declaration in support of Epic's Motion to Dismiss for Improper Venue or to Transfer Venue to the Western District of Wisconsin. I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently thereto under oath if called upon to do so.

2. Attached hereto as **Exhibit A** is a true and correct copy of a Patent Owner's Amended Power of Attorney Pursuant to 37 C.F.R. § 42.10(b) in *Unified Patents, LLC v. Navblazer, LLC*, IPR2020-00983, before the Patent Trial and Appeal Board, listing a Yonkers, New York address for the alleged inventor of the patents-in-suit, Raymond Joao.

3. Attached hereto as **Exhibit B** is a true and correct copy of a web capture of a LinkedIn profile page for Raymond Joao, listing Yonkers, New York.

4. Attached hereto as **Exhibit C** is a true and correct copy of a Lex Machina report indicating that, for cases pending between June 1, 2020 and June 4, 2021, the average time to trial in the Western District of Wisconsin was 563 days.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 22, 2021 at Los Angeles, California.

/s/ Nick Saros  
Nick Saros